

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Bankr. No. 15-23752 CMB
JEWEL J. OUTLAW,	)	
	)	Chapter 13
Debtor.	)	
	)	Docket No. 98
RONDA J. WINNECOUR,	)	Related to Docket No. 94
CHAPTER 13 TRUSTEE,	)	
Movant,	)	
	)	
vs.	)	Hearing Date & Time: 2/17/2021 at 1:30 p.m.
	)	
JEWEL J. OUTLAW,	)	
	)	
Respondent.	)	

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

AND NOW, comes the Respondent, by and through her attorney,  
Rodney D. Shepherd, Esquire, who respectfully represents the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. Debtor's counsel calculated a different amount of delinquency. A wage attachment was filed to make up for this anticipated shortfall. However, for some reason it never took effect. Counsel is again sending it to the employer. Debtor hopes to try and make up for the shortfall.
5. Admitted.
6. Admitted.

WHEREFORE, the Debtor prays that this Honorable Court deny the Trustee's Motion to Dismiss.

Respectfully submitted,

/s/ Rodney D. Shepherd  
Rodney D. Shepherd, Esquire  
Attorney for the Debtor  
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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, hereby certifies that a true and correct copy of the Debtor's Response to the Chapter 13 Trustee's Motion to Dismiss was served on the 8<sup>th</sup> day of January, 2021, by electronic filing, upon the following;

Ronda Winnecour, Esquire  
Chapter 13 Trustee  
[cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)

By: /s/ Rodney D. Shepherd  
Attorney for the Debtor